

EXHIBIT 3

From: Jessica Agger <jagger@zarwin.com>

Sent: Friday, November 8, 2024 8:17 AM

To: Amy L. Barrette <amy.barrette@bipc.com>; Christopher G. Mavros <cgmavros@zarwin.com>; Budner, Michael <MBudner@smbb.com>; Davis, Jeff <jsdavis@bradley.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Robinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>

Cc: Chante DePersia <cndepersia@zarwin.com>

Subject: RE: Chappell v Precision Forum's request for deposition dates in December 2024

Any of those days work for Chris.

Thank you!



Jessica Agger, Paralegal

One Commerce Square
2005 Market Street | 16th Floor | Philadelphia, PA 19103-7042
Direct Dial: [215.569.2800](tel:215.569.2800) |
Email: jagger@zarwin.com





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From: Amy L. Barrette <amy.barrette@bipc.com>
Sent: Thursday, November 7, 2024 5:16 PM
To: Christopher G. Mavros <cgmavros@zarwin.com>; Jessica Agger <jagger@zarwin.com>; Budner, Michael <MBudner@smbb.com>; Davis, Jeff <jsdavis@bradley.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Robinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>
Cc: Chante DePersia <cndepersia@zarwin.com>; Amy L. Barrette <amy.barrette@bipc.com>
Subject: RE: Chappell v Precision Forum's request for deposition dates in December 2024
Importance: High

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With respect to Mr. Brown, I am still waiting to hear back from Precision's counsel. As for Mr. Estes, he is available the following dates in January: 1/24, and 1/27-31. We will need to start at 9:00 am Eastern. Please let me know as soon as possible if those dates work for all counsel so that we can get it scheduled.

Amy Barrette
Shareholder
(she/her)

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amy.barrette@bipc.com

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From: Christopher G. Mavros <cgmavros@zarwin.com>
Sent: Wednesday, November 6, 2024 9:00 AM

To: Amy L. Barrette <amy.barrette@bipc.com>; Jessica Agger <jagger@zarwin.com>; Budner, Michael <MBudner@smbb.com>; Davis, Jeff <jsdavis@bradley.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Robinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>

Cc: Chante DePersia <cndepersia@zarwin.com>

Subject: Re: Chappell v Precision Forum's request for deposition dates in December 2024

Thanks, Amy. I believe we're able to depose Brown on one of those four days in December if you're producing him.

On Estes, can you let us know dates this month and next he would be available. Thanks



Christopher G. Mavros, Esq.

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In order to keep our attorneys and staff safe during the COVID-19 crisis and further to comply with various orders or suggestions from governmental authorities as to remaining closed during that time, Zarwin, Baum, DeVito, Kaplan, Schaer & Toddy has closed all of our offices. Because all attorneys and staff are working remotely, with respect to all of our client matters, including, but not limited to, any litigation matters, we expect to send all documents (including correspondence, pleadings, and discovery) via e-mail until further notice. Because we may not receive regular mail or other deliveries during this period of time, please e-mail copies of anything you send by regular mail or by overnight or other delivery. Kindly send all e-served and all other documents in your matter or case to the e-mail addresses for any Zarwin Baum attorney who is representing you in your matter or case, or who has communicated with you by e-mail on your matter or case. We appreciate your cooperation in this regard.

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From: Amy L. Barrette <amy.barrette@bipc.com>

Sent: Tuesday, November 5, 2024 11:16 PM

To: Christopher G. Mavros <cgmavros@zarwin.com>; Jessica Agger <jagger@zarwin.com>; Budner, Michael <MBudner@smbb.com>; Davis, Jeff <jsdavis@bradley.com>; Matthew Pilsner

<matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Robinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>

Cc: Chante DePersia <cndepersia@zarwin.com>

Subject: Re: Chappell v Precision Forum's request for deposition dates in December 2024

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Mr. Estes is an employee of Coterra. Mr Brown was a consultant until recently. I am working to facilitate dates and he is willing to appear but if you want to get a subpoena and serve it, then by all means go ahead.

Sent from my Verizon, Samsung Galaxy smartphone
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From: Christopher G. Mavros <cgmavros@zarwin.com>

Sent: Tuesday, November 5, 2024 5:57:13 PM

To: Jessica Agger <jagger@zarwin.com>; Amy L. Barrette <amy.barrette@bipc.com>; Budner, Michael <MBudner@smbb.com>; Davis, Jeff <jsdavis@bradley.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Robinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>

Cc: Chante DePersia <cndepersia@zarwin.com>

Subject: Re: Chappell v Precision Forum's request for deposition dates in December 2024

Amy, then let me know if I need to issue a subpoena if you have no control over producing these people. Thanks

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Christopher G. Mavros, Esq.

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From: Jessica Agger <jagger@zarwin.com>

Sent: Tuesday, November 5, 2024 1:01:41 PM

To: Amy L. Barrette <amy.barrette@bipc.com>; Budner, Michael <MBudner@smbb.com>; Davis, Jeff

<jsdavis@bradley.com>; Christopher G. Mavros <cgmavros@zarwin.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Robinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>

Cc: Chante DePersia <cndepersia@zarwin.com>

Subject: RE: Chappell v Precision Forum's request for deposition dates in December 2024

We do not have any conflicts as of right now. Please let us know as soon as possible regarding the potential date as it the weeks of the holidays.

Thank you!



Jessica Agger, Paralegal

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From: Amy L. Barrette <amy.barrette@bipc.com>

Sent: Tuesday, November 5, 2024 12:26 PM

To: Budner, Michael <MBudner@smbb.com>; Davis, Jeff <jsdavis@bradley.com>; Christopher G. Mavros <cgmavros@zarwin.com>; Jessica Agger <jagger@zarwin.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Robinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>

Cc: Chante DePersia <cndepersia@zarwin.com>; Amy L. Barrette <amy.barrette@bipc.com>

Subject: RE: Chappell v Precision Forum's request for deposition dates in December 2024

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Given counsels' schedule conflicts, we will not be able to proceed with Mr. Estes' deposition in December. Do any of you want to proceed with Mr. Brown's deposition the week of the 23rd or 30th if he is available? I do not want to waste time trying to schedule him during that time if counsel is not available. I also want to eliminate any future suggestion that Coterra delayed depositions.

Amy Barrette**Shareholder**

(she/her)

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412 562 1626 (o)
amy.barrette@bipc.com

Buchanan

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From: Budner, Michael <MBudner@smbb.com>

Sent: Tuesday, November 5, 2024 11:10 AM

To: Davis, Jeff <jsdavis@bradley.com>; Amy L. Barrette <amy.barrette@bipc.com>; Christopher G. Mavros <cgmavros@zarwin.com>; Jessica Agger <jagger@zarwin.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Robinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>

Cc: Chante DePersia <cndepersia@zarwin.com>

Subject: RE: Chappell v Precision Forum's request for deposition dates in December 2024

I also have a trial that is scheduled to start on 12/9. It's NJ, so it's technically just a listing, but it's our 9th or 10th listing, so I'm fairly certain that will go, which means I would be unavailable the weeks of 12/9 and 12/16.

Michael Budner

Partner



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From: Davis, Jeff <jsdavis@bradley.com>

Sent: Tuesday, November 5, 2024 11:07 AM

To: Amy L. Barrette <amy.barrette@bipc.com>; Christopher G. Mavros <cgmavros@zarwin.com>; Budner, Michael <MBudner@smbb.com>; Jessica Agger <jagger@zarwin.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Robinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>

Cc: Chante DePersia <cndepersia@zarwin.com>

Subject: RE: Chappell v Precision Forum's request for deposition dates in December 2024

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All:

My trial that was set for 12/2 has been moved to the week of 12/9, which will likely go the full week and would jeopardize proceeding on 12/12 and 12/13.

We have already mediated the case with no success and we are No. 1 on the docket.

Given the vagaries of trial, I don't have a problem noticing the deposition with the understanding that if I am still in trial, that they will need to be postponed.

Jeff

Jeff Davis

Partner | [Bradley](#)
jsdavis@bradley.com
d: 713.576.0370

From: Amy L. Barrette <amy.barrette@bipc.com>
Sent: Tuesday, November 5, 2024 9:38 AM
To: Christopher G. Mavros <cgmavros@zarwin.com>; Budner, Michael <MBudner@smbb.com>; Jessica Agger <jagger@zarwin.com>; Davis, Jeff <jsdavis@bradley.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Robinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>
Cc: Chante DePersia <cndepersia@zarwin.com>
Subject: RE: Chappell v Precision Forum's request for deposition dates in December 2024

Neither I nor Coterra has any control over Mr. Brown's schedule at this point, so I cannot guarantee he will be available during the 12th- 17th, or at any time in December. If all counsel could give me their availability for the 12th through the 17th, that would be a great start.

Amy Barrette
Shareholder
(she/her)

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412 562 1626 (o)
amy.barrette@bipc.com

Buchanan

From: Christopher G. Mavros <cgmavros@zarwin.com>
Sent: Monday, November 4, 2024 2:51 PM
To: Amy L. Barrette <amy.barrette@bipc.com>; Budner, Michael <MBudner@smbb.com>; Jessica Agger <jagger@zarwin.com>; Davis, Jeff <jsdavis@bradley.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Robinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>
Cc: Chante DePersia <cndepersia@zarwin.com>
Subject: Re: Chappell v Precision Forum's request for deposition dates in December 2024

Thanks, Amy. Would be good to schedule these on the same day if possible.



Christopher G. Mavros, Esq.

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From: Amy L. Barrette <amy.barrette@bipc.com>
Sent: Monday, November 4, 2024 2:29 PM
To: Budner, Michael <MBudner@smbb.com>; Christopher G. Mavros <cgmavros@zarwin.com>;

Jessica Agger <jagger@zarwin.com>; Davis, Jeff <jsdavis@bradley.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Robinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>
Cc: Chante DePersia <cndepersia@zarwin.com>; Amy L. Barrette <amy.barrette@bipc.com>
Subject: RE: Chappell v Precision Forum's request for deposition dates in December 2024

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Counsel,

Mr. Estes is available for his deposition on the following dates: 12/12, 12/13, 12/16, or 12/17. Please confirm by the end of the week whether any of those dates work for you so that we can lock this in place before his schedule changes. I should have dates for Mr. Brown shortly.

Amy

Amy Barrette
Shareholder
(she/her)

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From: Budner, Michael <MBudner@smbb.com>
Sent: Friday, November 1, 2024 3:12 PM
To: Christopher G. Mavros <cgmavros@zarwin.com>; Amy L. Barrette <amy.barrette@bipc.com>; Jessica Agger <jagger@zarwin.com>; Davis, Jeff <jsdavis@bradley.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Robinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>
Cc: Chante DePersia <cndepersia@zarwin.com>
Subject: RE: Chappell v Precision Forum's request for deposition dates in December 2024

That's fine with me, as well. Thanks.

Michael Budner
Partner



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mbudner@smbb.com | www.smbb.com

From: Christopher G. Mavros <cgmavros@zarwin.com>

Sent: Friday, November 1, 2024 2:04 PM

To: Amy L. Barrette <amy.barrette@bipc.com>; Jessica Agger <jagger@zarwin.com>; Davis, Jeff <jsdavis@bradley.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Budner, Michael <MBudner@smbb.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Robinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>

Cc: Chante DePersia <cndepersia@zarwin.com>

Subject: Re: Chappell v Precision Forum's request for deposition dates in December 2024

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Amy, I am fine with these deps being conducted remotely. Thanks



Christopher G. Mavros, Esq.

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From: Amy L. Barrette <amy.barrette@bipc.com>
Sent: Thursday, October 31, 2024 11:43 AM
To: Jessica Agger <jagger@zarwin.com>; Davis, Jeff <jsdavis@bradley.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Budner, Michael <MBudner@smbb.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Robinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>; Christopher G. Mavros <cgmavros@zarwin.com>
Cc: Chante DePersia <cndepersia@zarwin.com>
Subject: Chappell v Precision Forum's request for deposition dates in December 2024

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Counsel,

Given the holidays, December is not ideal for the depositions, but I will work on dates. There are logistical issues. Mr. Estes's office is in Texas. If he has to travel, that will impact his available dates. Do all counsel agree to conduct his deposition via video? If not, I propose the deposition be held at Buchanan's office in Pittsburgh. This location will be easier for everyone traveling. That beats everyone having to travel to Susquehanna County.

Please let me know as soon as possible.

Amy Barrette
Shareholder
(she/her)

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From: Jessica Agger <jagger@zarwin.com>
Sent: Thursday, October 31, 2024 8:34 AM
To: Davis, Jeff <jsdavis@bradley.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Budner, Michael <MBudner@smbb.com>; Amy L. Barrette <amy.barrette@bipc.com>; Howard, Ty

<thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Robinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>
Cc: Christopher G. Mavros <cgmavros@zarwin.com>; Chante DePersia <cndepersia@zarwin.com>
Subject: RE: #44410 Chappell - Discovery Requests

Good Morning Counsel,

We are withdrawing out requests to Cabot. We would like to schedule depositions of Shane Brown & Frank Estes. Please let me know availability for December.

Thank you!



Jessica Agger, Paralegal

One Commerce Square
2005 Market Street | 16th Floor | Philadelphia, PA 19103-7042
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From: Jessica Agger

Sent: Friday, October 25, 2024 9:56 AM

To: Davis, Jeff <jsdavis@bradley.com>; Matthew Pilsner <matthew.pilsner@bipc.com>; Budner, Michael <MBudner@smbb.com>; Amy L. Barrette <amy.barrette@bipc.com>; Howard, Ty <thoward@bradley.com>; Tara Klingensmith <tara.klingensmith@bipc.com>; Robinson, Michelle <mrubinson@smbb.com>; Bell, Andy <abell@bradley.com>; Duffy, Andrew R. <ADuffy@smbb.com>

Cc: Christopher G. Mavros <cgmavros@zarwin.com>; Chante DePersia <cndepersia@zarwin.com>

Subject: #44410 Chappell - Discovery Requests

Good Morning,

Attached please find Defendant, Forum Tech's discovery requests directed to all parties.

Thank you!

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